

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WRS, INC., d/b/a WRS MOTION PICTURE
LABORATORIES, a corporation

Plaintiff,

PLAZA ENTERTAINMENT, INC., a
Corporation, ERIC PARKINSON, an
individual, CHARLES von BERNUTH, an
individual, and JOHN HERKLOTZ, an
individual

Defendants.

No. 2:00-CV-2041-AJS

BRIEF OF DEFENDANT PLAZA ENTERTAINMENT, INC.
IN SUPPORT OF MOTION FOR RECONSIDERATION
OR FOR RELIEF FROM JUDGMENT

The Defendant Plaza Entertainment, Inc., by and through its undersigned counsel, and in support of its Motion For Reconsideration Or For Relief From Judgment, relies upon, adopts and hereby incorporates by reference the Brief of Charles von Bernuth (Docket No. 151) in support of Mr. von Bernuth's substantially similar motion for reconsideration or for relief from judgment, and the averments, affidavits and documents cited therein. Plaza Entertainment's motion and that of Mr. von Bernuth are substantially similar, and are based upon the identical facts and law.

WHEREFORE, the Defendant Plaza Entertainment, Inc. respectfully requests that this Court enter an Order vacating the judgment against Plaza Entertainment, Inc. as to both liability and damages, thereby affording Plaza Entertainment, Inc. the opportunity to defend on the merits.

Respectfully Submitted,

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Date: January 25, 2008